

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
LAFAYETTE DIVISION**

RANBURN CORPORATION d/b/a)	
RANBURN CLEANERS,)	
Plaintiff,)	
)	
v.)	Civil Action No.: 4:16-cv-00088-RL-PRC
)	
ARGONAUT GREAT CENTRAL)	
INSURANCE COMPANY, NATIONAL)	
FIRE AND INDEMNITY EXCHANGE,)	
MERIDIAN MUTUAL INSURANCE)	
COMPANIES n/k/a STATE AUTO)	
INSURANCE COMPANIES,)	
Defendants.)	
*****)	
NATIONAL FIRE AND INDEMNITY)	
EXCHANGE,)	
Counter Claimant,)	
)	
vs.)	
)	
RANBURN CORPORATION d/b/a)	
RANBURN CLEANERS,)	
Counter Defendant.)	
*****)	
STATE AUTO INSURANCE COMPANIES,)	
Counter Claimant,)	
)	
vs.)	
)	
RANBURN CORPORATION d/b/a)	
RANBURN CLEANERS,)	
Counter Defendant.)	

**MOTION FOR LEAVE TO WITHDRAW APPEARANCE ON BEHALF OF
DEFENDANT NATIONAL FIRE AND INDEMNITY EXCHANGE**

Comes now Attorney Gregory J. Tonner of the Law Firm of Moore & Portelli, and moves for leave of Court for an Order permitting Attorney Gregory J. Tonner to withdraw as counsel of record for defendant/counter claimant, National Fire and Indemnity Exchange (“NIE”), and in support of the same, states to the Court as follows:

1. Attorney Gregory J. Tonner has represented defendant/counter claimant NIE since the inception of this case.

2. Due to the needs of his two elderly parents, undersigned counsel and his wife are seriously considering early retirement options or partial early retirement options to care for them.

3. Undersigned counsel has notified his client of the situation and the client has consented to the withdrawal of Attorney Gregory J. Tonner.

4. This case has not yet been assigned a trial date.

5. On October 29, 2018, Attorney Daniel J. Cunningham appeared for defendant/counter claimant, NIE, [DE 165].

6. Undersigned counsel seeks withdrawal effective October 30, 2018.

7. Undersigned counsel submits that there has been full compliance with N.D.Ind.L.R. 83-8(c).

8. Undersigned counsel submits that there has been good cause shown for the withdrawal of counsel, Attorney Gregory J. Tonner for the defendant/counter claimant, NIE.

WHEREFORE, Attorney Gregory J. Tonner respectfully requests that the Court enter an Order granting leave of Court permitting undersigned counsel to withdraw as counsel of record for the defendant/counter claimant National Fire and Indemnity Exchange, that he be removed from the distribution list for pleadings filed in this case, and for all other just and proper relief.

Respectfully submitted,

/s/ Gregory J. Tonner

Gregory J. Tonner, #1925-45

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CERTIFICATE OF SERVICE

I certify that on October 30, 2018, a copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Brent W. Huber/Amy S. Berg
Dennis F. Cantrell/Katherine L. Shelby/Ian P. Goodman
David A. Temple/Erik S. Mroz/Alyssa C. Hughes
Daniel J. Cunningham

/s/ Gregory J. Tonner